

FROM: 54652509

TO: Bundy, Thomas; Farahmand, Maryam; Parvis, Shamsi

SUBJECT: Declaration of Mahsa Parviz

DATE: 07/07/2023 05:34:38 PM



JUL 13 2023

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Declaration of Mahsa Parviz

I, MAHSA PARVIZ, DECLARE:

BY

DEPUTY

1. "My name is Dr. Mahsa Parviz. I am over 18 years of age, am fully competent to make this Declaration and have personal knowledge of the facts stated herein. To my knowledge, all of the facts stated in this Declaration are true and correct."

2. "I am the Petitioner in this matter. I make this Declaration in support of my request for a domestic violence restraining order against Respondent Andrew George Watters."

3. "The exhibits to this declaration must be filed under seal pursuant to California Rules of Court Sec. 5.552, California Welfare & Institutions Code Sec. 827 and the sealing order in Travis County, Texas cause number D-1-DC-21-900031."

4. "Andrew George Watters is a local attorney with a lengthy California State Bar disciplinary history who claims his law firm generates millions of dollars of revenue per year. He and his law firm, Andrew Watters PC, began representing me in April 2021. Attached hereto as 'EXHIBIT A' is a true and correct copy of Andrew Watters' April 28, 2021 letter to a Texas prosecutor wherein he represents himself as my attorney and attempts to negotiate the terms of a confidential cooperation agreement and enforce a restraining order. Attached hereto as 'EXHIBIT B' is a true and correct copy of Austin Police Department Summary Incident Report number 2021-8003210, documenting the serious threat to me and my family in relation to Respondent's legal representation, which will likely worsen without issuance of a restraining order against Mr. Watters."

5. "I met with Mr. Watters only a handful of times in public to discuss legal matters but Mr. Watters took advantage of my vulnerable situation. He became infatuated with me and wanted to date while continuing his legal representation, even though he knew I was married and not interested in him. Although my agreement to discreetly date him was conditioned on his specific performance of legal services and payment of expenses, he held onto the delusion that he was actually in a "personal romantic relationship" with me and went as far as creating a "hall of shame" about me and my family on his law firm webpage at <https://www.andrewwatters.com>."

6. "Each time we met, he consumed so much alcohol that I had to get him a hotel room, which he stayed at on and off for months because he didn't have a functional shower at his parents' one bedroom apartment and storage in San Mateo, at which he still resides. In May 2021, law enforcement documented Mr. Watters' unstable behavior as my attorney, alcohol abuse and four 750 ml bottles of his hard liquor in the hotel room."

7. "He proposed a partnership, which I declined upon review of his business bank account statements. I tried to distance myself once he showed me his law firm's Chase business account statements and I noticed \$500 payments to prostitutes, debits that I recognized are from the IRS, and absolutely no earnings at the end of each month despite approximately \$40,000.00 credited monthly to the account. I inquired about the concerning transactions and he informed me of his six-figure IRS tax debt and that he was diagnosed with Bipolar Disorder about 15 years ago after finishing law school when he stayed up for 6 days straight without using any substances in an attempt to apply for jobs and was subsequently hospitalized due to psychosis."

8. "His psychiatrist at Kaiser Permanente North has prescribed him several medications, including the heavy-duty anti-psychotic Risperdal, which Mr. Watters abuses daily and combines with alcohol against his doctor's orders."

9. "My attempts to distance myself and keep my Atherton residence private only made his stalking worse. Mr. Watters started following me to my gym, the Equinox in Palo Alto, California, and would wait for me in the parking lot for several hours. By June 2021, I had told him my Equinox membership had expired in an effort to prevent further stalking. Staff informed me that Mr. Watters was searching for me while I remained at Equinox for several hours, afraid to leave my gym. He waited in the parking lot for 45 minutes after Equinox closed and confronted me on my way to my vehicle. On his law firm webpage, he publicly admits to this, stating "I witnessed her commit at least one petty theft when she deliberately entered a gym without paying after she told me her membership had expired, and then abused their generosity by using the entire facility for hours,

even after they closed and I was waiting for her in the parking lot for about 45 minutes.""

10. "Mr. Watters continued stalking me and would share information about me with my former brother-in-law, a disbarred attorney who was facing life imprisonment for the organized crime I reported and against whom I had a restraining order which Mr. Watters attempted to enforce in April 2021."

11. "On August 17, 2021, after 5 weeks of not hearing from me, he again tracked my location and mailed me an eerie letter wherein he admits to constantly searching for me, stating "I happened to notice online in a routine search" in reference to my physical location. Although I am well-known in my field as a Harvard-trained medical research scientist and have been an elected member of the American Academy of Neurology since 2016, Mr. Watters continues to contact and spread rumors to my employers, research sponsors and legal team without my consent or knowledge in an attempt to sabotage my career, reputation, peace of mind, the cooperation agreement and related cases. In this letter, he admits to spreading highly inappropriate and false rumors to my legal team and others about my personal life, my mental health and alleged incompetency, stating: "I simply do not think you are competent to stand trial in a Federal felony case, and I have shared this concern with your defense counsel. Feel free to have your attorney reach out ..."

12. "On October 9, 2021, I sent Mr. Watters a cease and desist letter via email and copied my mother and sister, as well as two of my attorneys, Mr. Thomas Bundy and Mr. Koudiah. I filed a State Bar complaint thereafter but was forced to stop communicating with the California State Bar when Mr. Watters retaliated by creating several horrifying webpages, with photos, explicit content, and attorney-client privileged documents and information, all about me and my family on his law firm webpage."

13. "On his law firm webpage, he publicly makes offensive, false comments about me, about matters he became privy to through the course of his legal representation, and about my whole family. His comments have injured and traumatized my entire family, including my five-year-old daughter, sister, and parents, both of whom are college math professors and senior citizens with conservative, traditional family values. My parents have lost teaching assignments and investments, have been cursed at, publicly ridiculed and have even been hospitalized several times from the emotional turmoil Mr. Watters has created for my entire family."

14. "Mr. Watters has been posting content about me and my family on his law firm webpage since February or March of 2022 and frequently updates the website with even more repulsive material, such as fabricated claims that my parental rights to my daughter were terminated in Texas and she's currently in foster care, that I had an alcohol-induced miscarriage when underage, that I am wholly uneducated and have various mental illnesses, that I have had sexual relations with numerous men without using protection, that I have been administered the birth control shot, that all of my relationships have ended because I have been unfaithful to my significant other, that I had sexual relations with a surgeon at my sister's wedding over a decade ago, that all my research is fake, that I am homeless but live a lavish lifestyle using my parents' money, that my whole family is just as mentally-ill and irresponsible as I allegedly am, that I print hundred dollar bills, and that I am a sexually promiscuous "5'9" Persian statute" who is "just as attractive" as his wife."

15. "Most alarmingly, Mr. Watters has hosted multiple online "forums" about me wherein he claims to have contacted my parents on behalf of "all my friends in Boston", "in an attempt to conduct an intervention" in order to prevent me from having a second alcohol-induced miscarriage. His forums encourage the public to commit hate crimes against me and my family on the basis of our Persian-American heritage and the various rumors he has manufactured. Just within the past month, I was physically attacked and called a "baby killer" due to Mr. Watters' public disclosure and falsification of my medical records from when I was a minor, which he obtained over the course of his legal representation."

16. "He has attempted to isolate me from my daughter by publicly claiming she's in foster care, when she is not, and that I have no parental rights to her, even though he personally verified that there has never been a judgment in a suit affecting my parent-child relationship with my daughter. Attached hereto as 'EXHIBIT C' and fully incorporated herein for all purposes is a true and correct copy of the Texas Vital Statistics Unit certification of September 10, 2021, confirming that there is no judgment affecting the parent-child relationship to my daughter, which was requested by and sent directly to Mr. Watters in his capacity as an attorney with a legitimate need for this confidential information."

17. "My family and I have had enough and need Mr. Watters and his law firm to stop distributing the aforementioned content about me and my family, whether online or through other means. We are terrified of Mr. Watters and believe this man will not stop until he is behind bars with my former brother-in-law, who has also contributed to this heinous and publicized abuse. Law enforcement has directed me to obtain a domestic violence restraining order to end the ongoing physical and emotional abuse and so that Mr. Watters will be arrested if he doesn't stop engaging in the conduct complained of herein."

18. "I declare under penalty of perjury that the foregoing Declaration is true and correct."

TRULINCS 54652509 - PARVIZ, MAHSA - Unit: SET-D-A

Executed in Seattle, Washington, on July 7th, 2023 by Mahsa Parviz.

_____/s/ Mahsa Parviz
MAHSA PARVIZ

A handwritten signature in blue ink, appearing to read 'Mahsa Parviz', is written over a horizontal line. The signature is stylized with a large, looping 'P' and a long horizontal stroke.